



Intermountain Forest Association

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March 3rd, 2020

Reviewing Officer
U.S.D.A Forest Service
Rocky Mountain Region
1617 Cole Blvd. Building 17
Golden, CO 80401

Subject: Taylor Park Vegetation Management Project Objection

Dear Reviewing Officer:

Intermountain Forest Association (IFA) is a member-based organization that advocates for healthy forests and healthy communities, including actively promoting sound forest management that provides a stable and sustainable supply of timber from public and private forestlands. Given that many of IFA's members heavily rely on timber output from the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG), we are very supportive of the proposed Taylor Park Vegetation Management project on the Gunnison District. Recognizing the importance of being involved with the process, IFA submitted comments on the initial scoping, and both the 1st and 2nd draft of the Environmental Assessment (EA). Therefore, having standing as outlined in 36 CFR Part 218, subparts A and B, we submit the following objections to the Final EA.

Decision Making Triggers for Adaptive Implementation – Table 1.

- Watershed – we disagree with the Yellow Light Trigger Adaptive Action in terms of discontinuing treatment in watershed so 25% threshold is not exceeded. If treatment is discontinued, the yellow light and red-light triggers are essentially the same. We request the word “discontinue” be removed and the Action simply state to reduce acres of treatment.

Appendix A. Design Features

Invasive Weeds

- IW-3B – we are concerned that cut units and/or stands within priority areas can be deferred throughout the implementation period of the proposed action if new invasive plants are discovered, as depending on the timing, this could drastically affect a sale that has already been purchased. We request additional clarification be included that details how this will be handled if a sale has already been purchased.

Recreation

- REC-2 – We understand the importance of special use permits and concessionaire programs. We ask that all restrictions (wildlife, roads, etc.) be considered before giving priority to concessioners and their summer operating season. For example, if other restrictions prohibit operations during other times, the summer operating season may be the only feasible time for harvesting operations. We request additional language be included in this design feature to allow for this flexibility.

We look forward to working with you to resolve the issues discussed above as you move forward with the Taylor Park Vegetation Management Project.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manager